UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

AARYANA MALCOLM, et al.,	
Petitioners,	
v.	Case No. 20-CV-02503 (MJD-LIB)
M. STARR, et al.,	
Respondents.	

DECLARATION OF DR. LINDA LINDNER

- I, Dr. Linda Lindner, do hereby declare and state as follows:
- I am currently employed by the Federal Bureau of Prisons (BOP) of the United States Department of Justice, as a medical officer at the Federal Correctional Institution in Waseca, Minnesota (FCI Waseca). I began working for the BOP as a medical officer in May of 2020. I am a Doctor of Medicine and have completed my residency in internal medicine. I have almost twenty years' experience in office and hospital based medicine as well approximately four years of emergency department experience.
- 2. As a medical officer at FCI Waseca, I am responsible for the delivery of health care to the inmate population. My primary responsibility is conducting Chronic Care Clinics, which are regular clinics to manage chronic medical conditions, such as diabetes, high blood pressure, or high cholesterol. I work in conjunction with mid-level providers, either Physicians Assistants (PA) or Nurse Practitioners (NP), who evaluate inmates in response to sick call requests. Additionally, I am the on-

- call physician every other week. I report to the Health Services Administrator on the executive side and to the Acting Clinical Director on the clinical side.
- 3. For the past seven months, I have served as the medical officer at FCI Waseca during the ongoing COVID-19 pandemic. Ensuring quality and timely patient care has been and continues to be the top priority for me and for the other members of the medical staff at FCI Waseca. Like many community medical resources dealing with COVID-19 outbreaks, FCI Waseca's resources have been strained during the September 2020 COVID-19 outbreak, but our medical team endeavored to provide essential care to all inmates as expediently as possible despite the unprecedented and challenging circumstances.
- 4. I understand that fourteen inmates have filed an action in Federal District Court. I have reviewed the medical records of the inmates identified in this action. I make the following declaration based on my review of the inmate's medical records, my training and education, and my personal knowledge and experience. I have attached true and correct copies of the inmates' relevant medical records as stated below. In many circumstances, another provider met with the inmate, but I reviewed and co-signed the clinical encounter note.

I. TREATMENT OF COVID-19 AT FCI WASECA

5. For mild courses of COVID-19 illness, treatment for FCI Waseca primarily consisted of supportive therapies for the symptoms, such as over-the-counter (OTC) medication to reduce fevers, address body aches, and sooth sore throats.

- 6. If the COVID-19 illness exacerbated pre-existing conditions, such as asthma, then treatment was provided as clinically indicated to treat those exacerbations.
- 7. FCI Waseca's medical services are the equivalent of a primary care office in the community. If at any point, the inmate decompensated to a point where FCI Waseca did not have the ability to care for her at the facility, she was emergently transferred to the community hospital for further treatment.
- 8. As part of my official duties, I am responsible for working with a multi-disciplinary team of health care professionals who are responsible for the medical, dental, and health services of FCI Waseca. As part of a team, I help oversee the provision of the best possible patient care to the inmate population. I have seen first-hand the tireless efforts of myself and fellow staff at FCI Waseca that have gone into responding to the COVID-19 pandemic and continuing to provide the best care possible.
- 9. As is the case in the world at large, the COVID-19 pandemic has presented unique, fast-moving, and evolving challenges at FCI Waseca. Our medical staff has worked very hard to address those challenges in accordance with BOP policy and directives, as well as the ever-changing pandemic environment within and outside the prison.

II. THE PETITIONERS

A. Kristina Kay Bohnenkamp, Register No. 11804-029

10. I have reviewed and am familiar with the medical records of inmate Kristina Kay Bohnenkamp, Register No. 11804-029, attached hereto as Exhibit 1 (January 1, 2020, through December 10, 2020).

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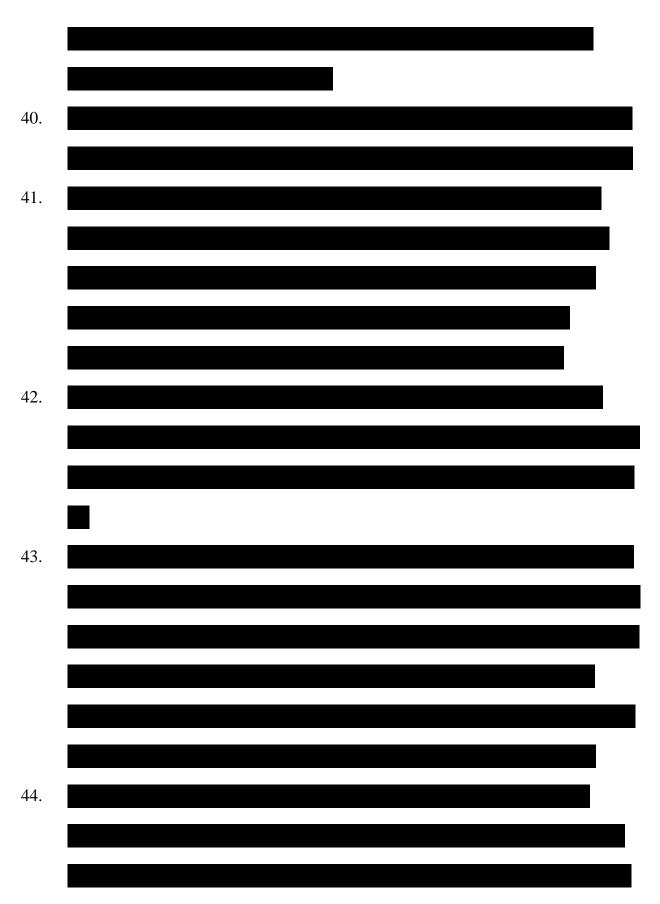
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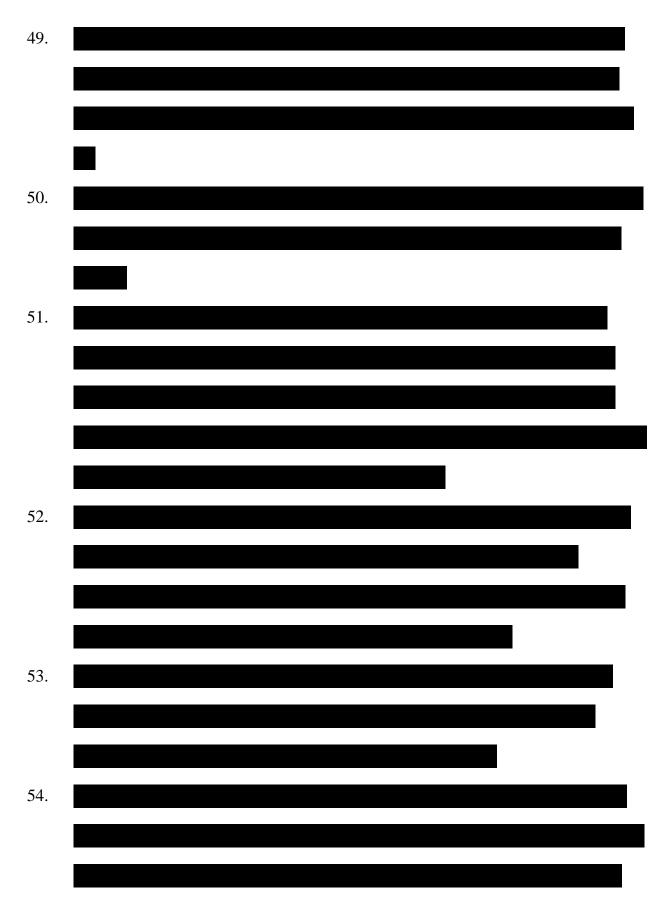
I have r	eviewed and am	familiar with t	he medical red	cords of inmate	e Shelle I
Brooks,	Register No. 040)27-029, attacl	ned hereto as l	Exhibit 2 (Janu	ary 1, 20
through	December 10, 20	020).			

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C.	Carrie Anne Casarez, Register No. 17944-041
I hav	e reviewed and am familiar with the medical records of inmate Carrie
	rez, Register No. 17944-041, attached hereto as Exhibit 3 (January 1, 2)
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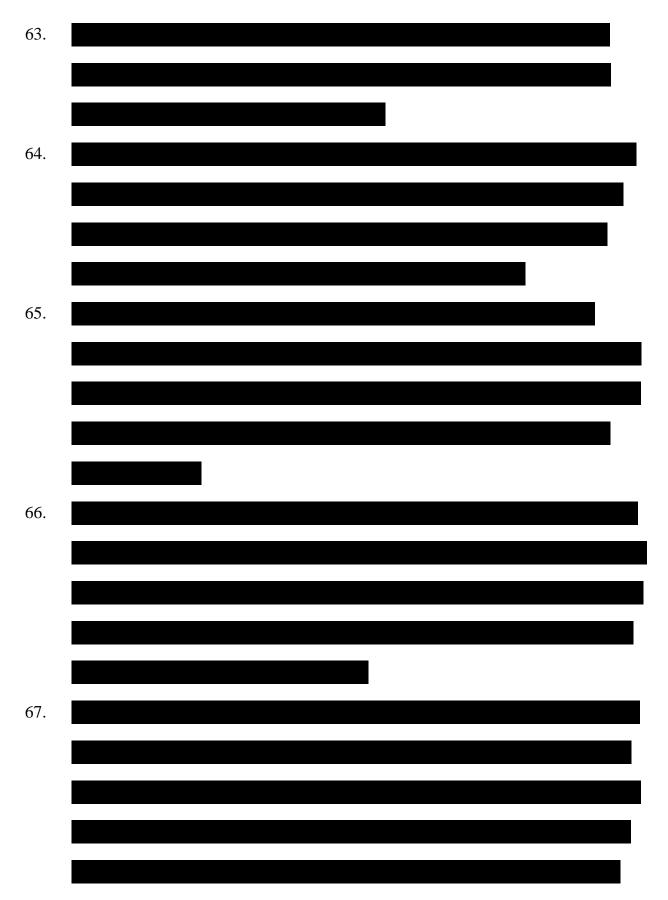
D. N	oelle DuBray, Regis	ster No. 13137-	073	
I have re	viewed and am fami	liar with the me	dical records of	inmate Noelle
DuBray,	Register No. 13137-	073, attached h	ereto as Exhibit	4 (January 1, 2
through 1	December 10, 2020).			

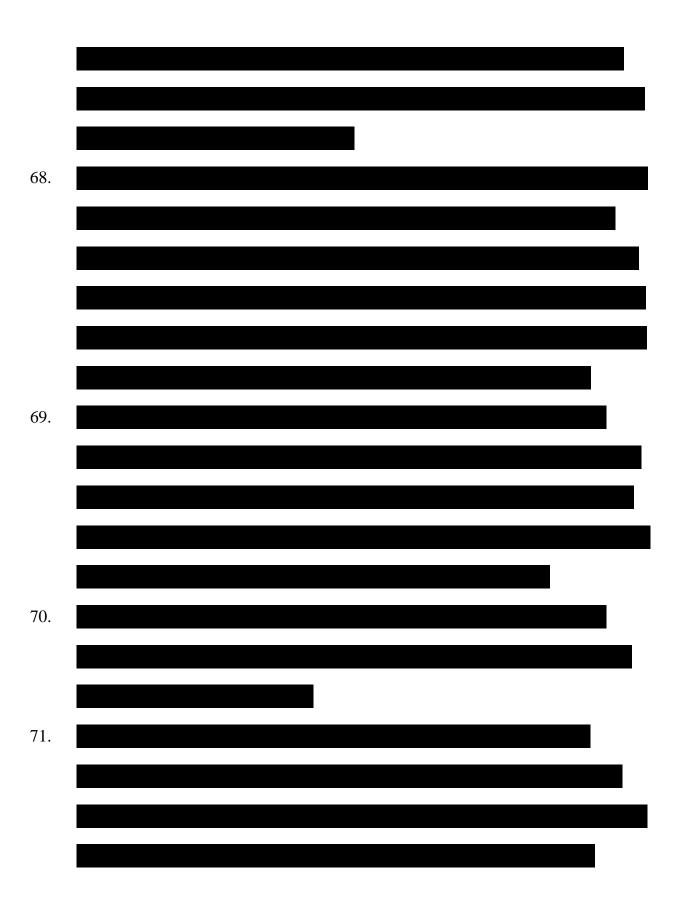




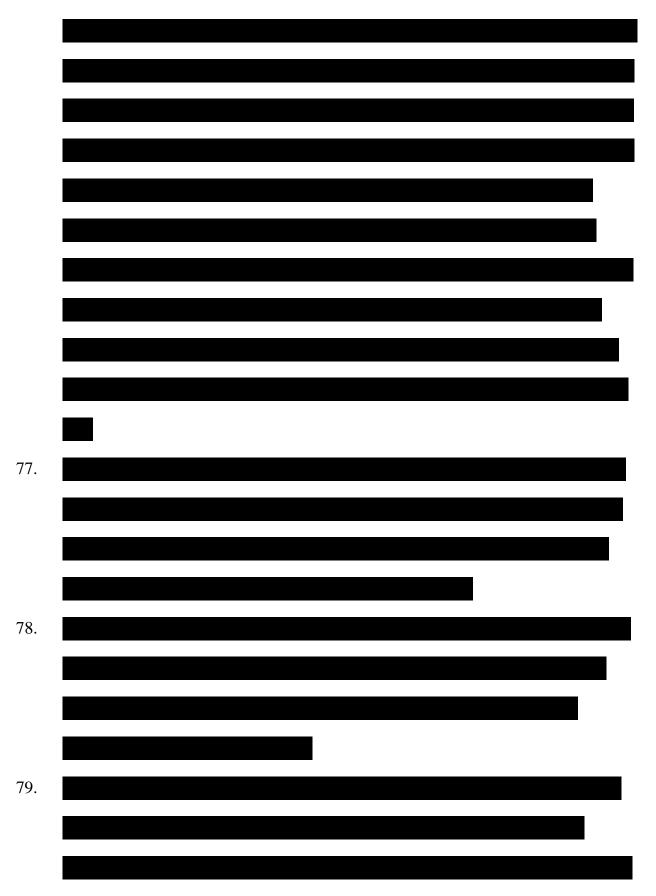
E. Pauline Irene Hemicker, Register No. 16158-091

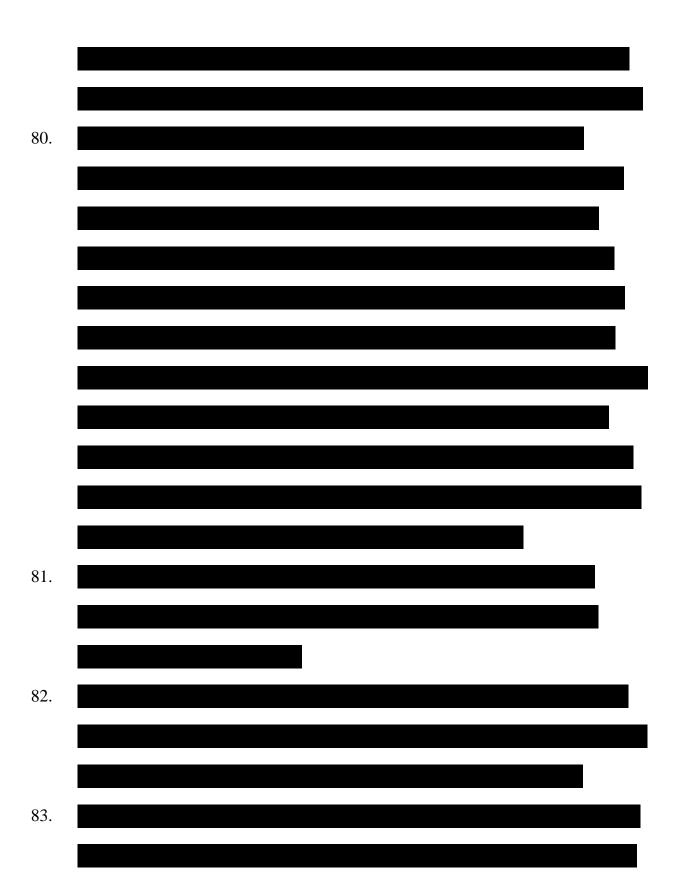
58.	I have reviewed and am familiar with the medical records of inmate Pauline Irene
	Hemicker, Register No. 16158-091, attached hereto as Exhibit 5 (January 1, 2020,
	through December 10, 2020).
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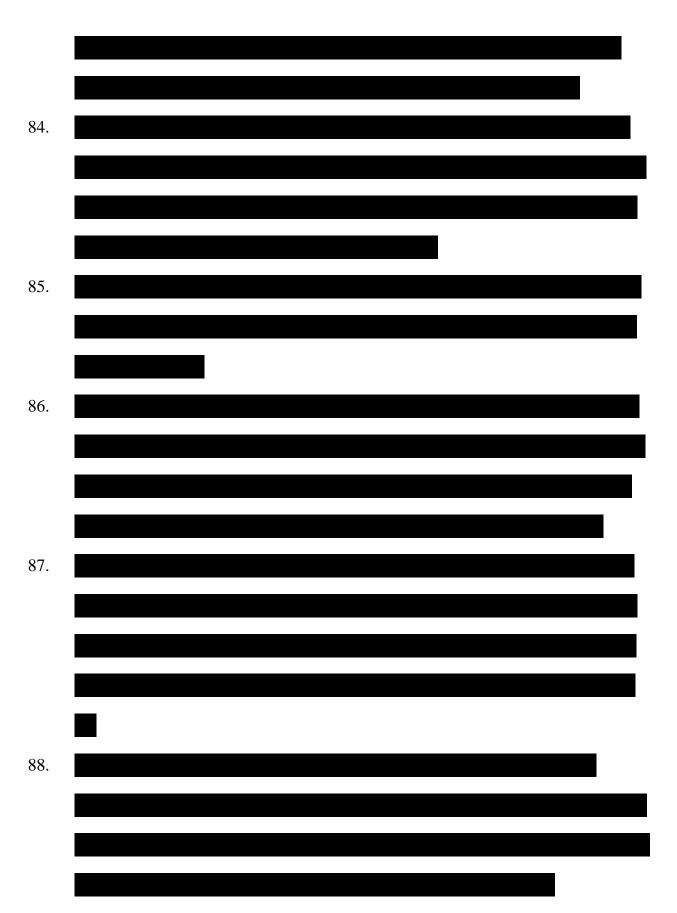


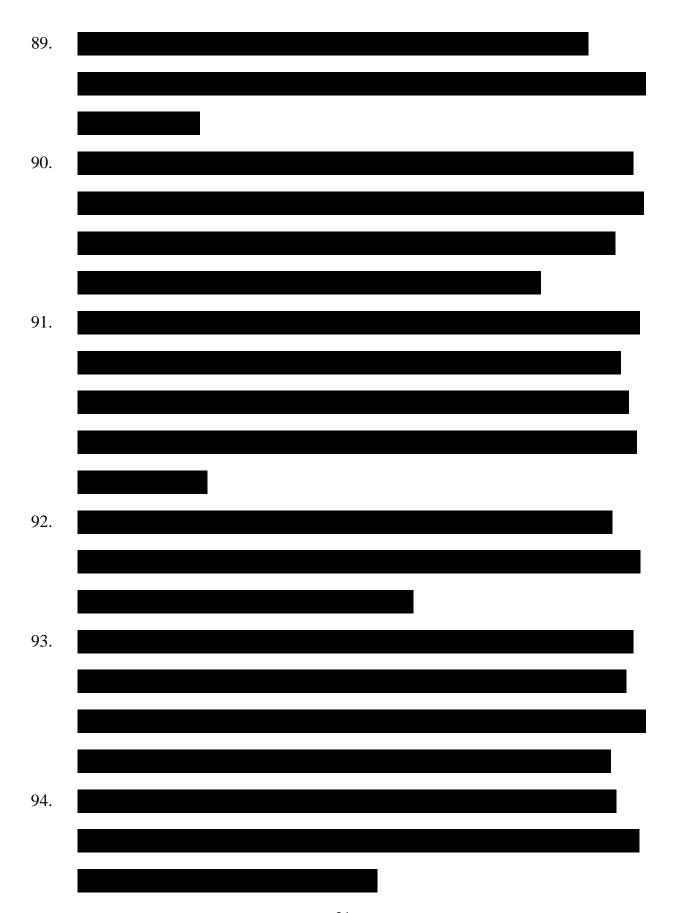


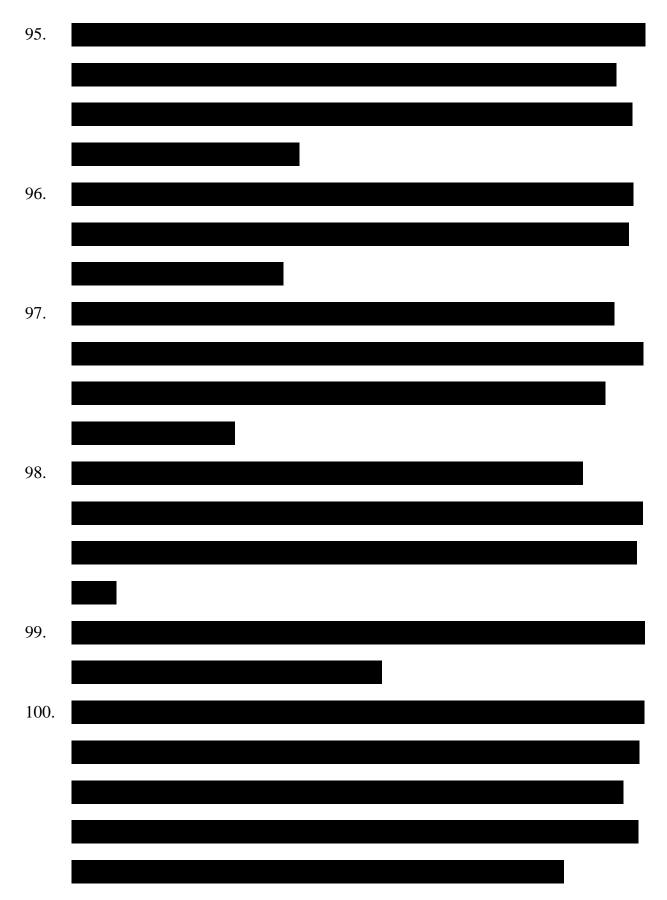
F.	Kimberly Fay Inal	bnit, Register N	o. 17393-028	
I hav	ve reviewed and am fa	miliar with the n	nedical records of i	nmate Kimberly Fa
Inab	nit, Register No. 1739	939-0028, attache	d hereto as Exhibi	t 6 (January 1, 2020
to D	ecember 10, 2020).			

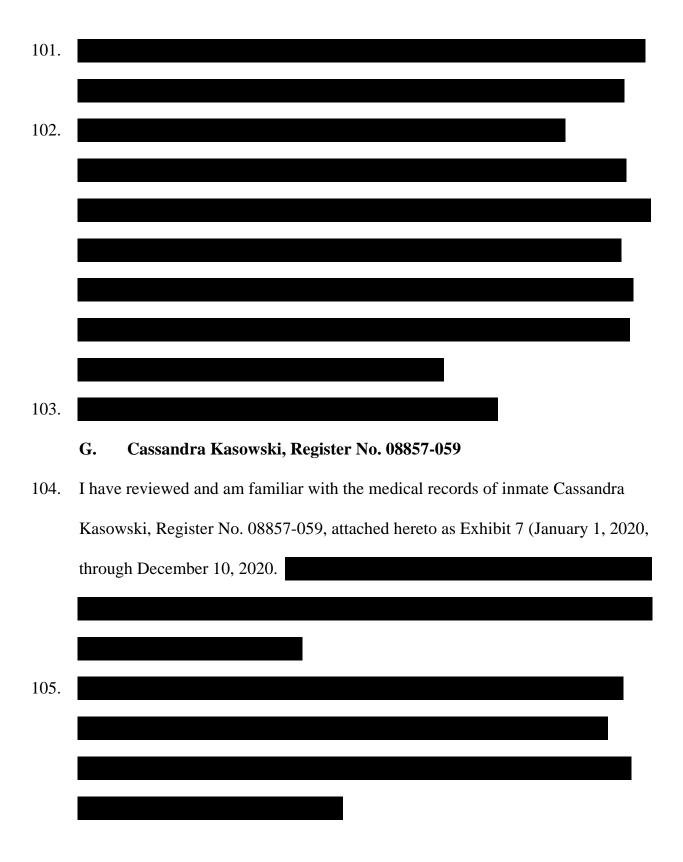


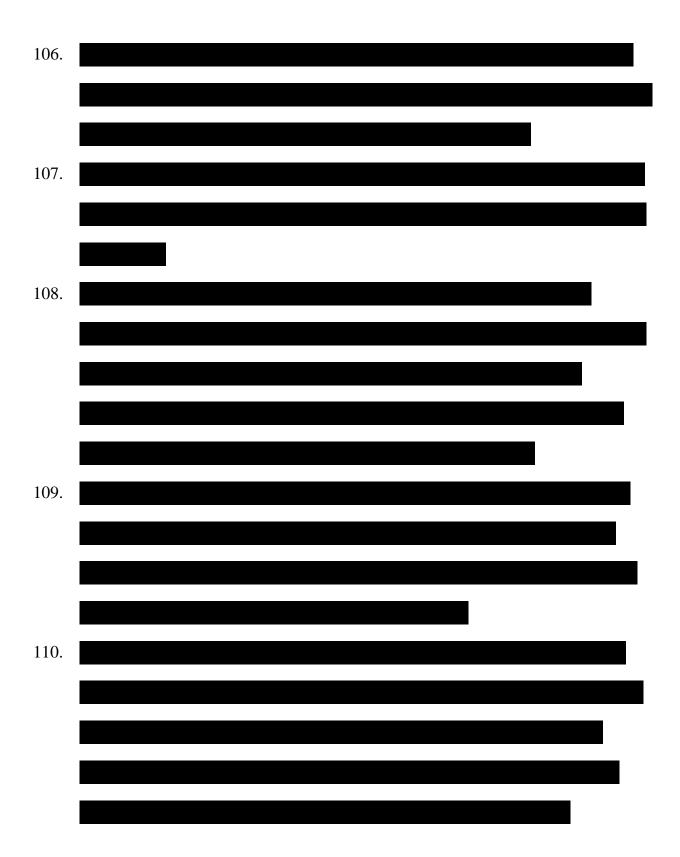


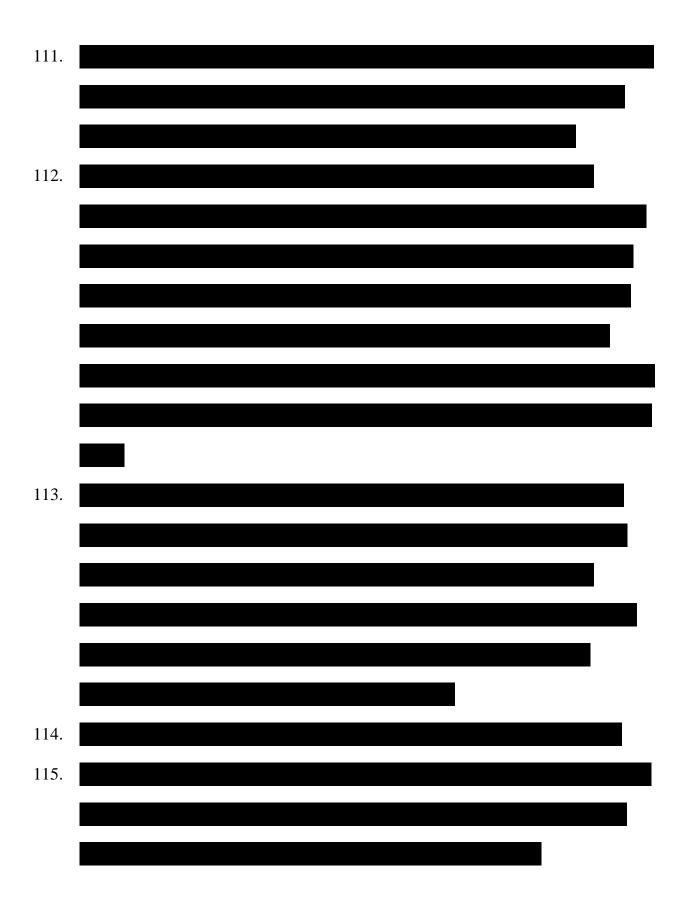


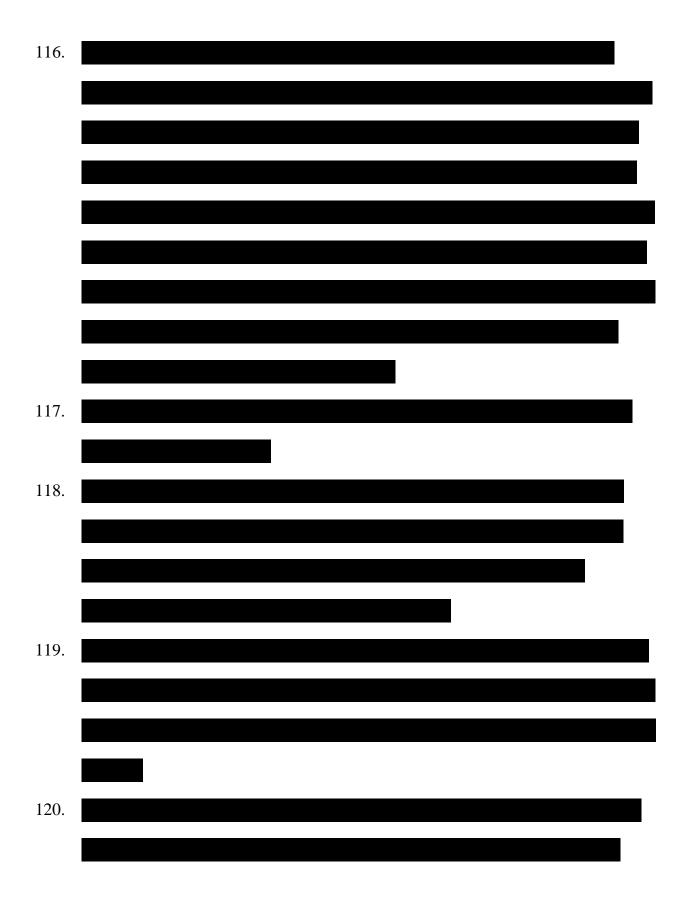




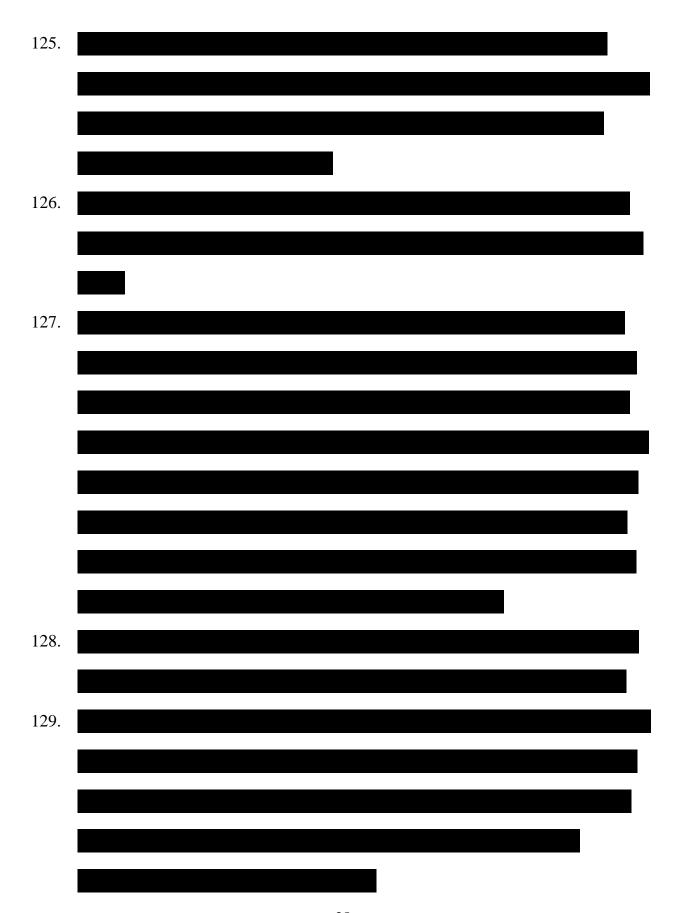


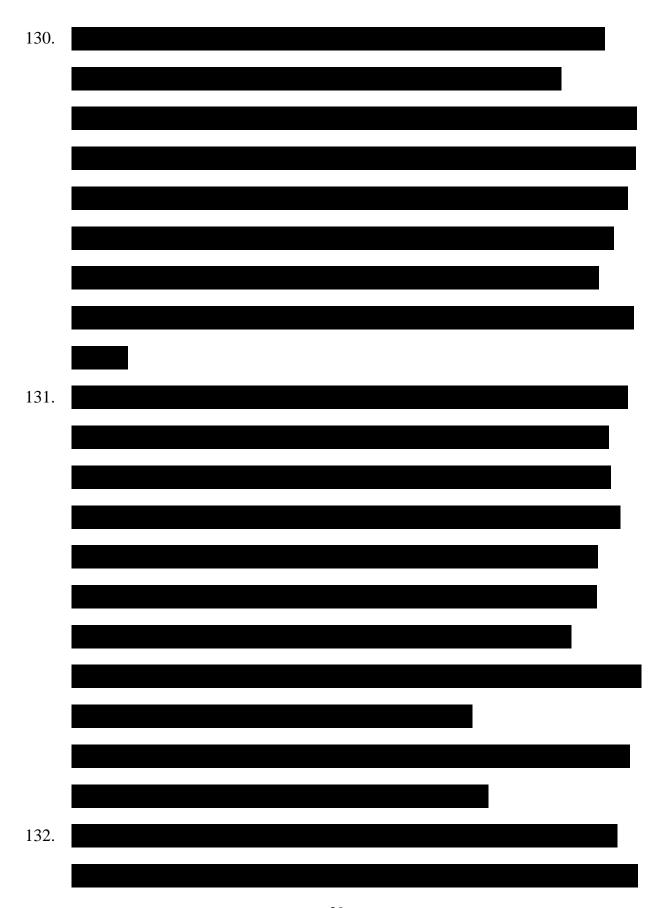


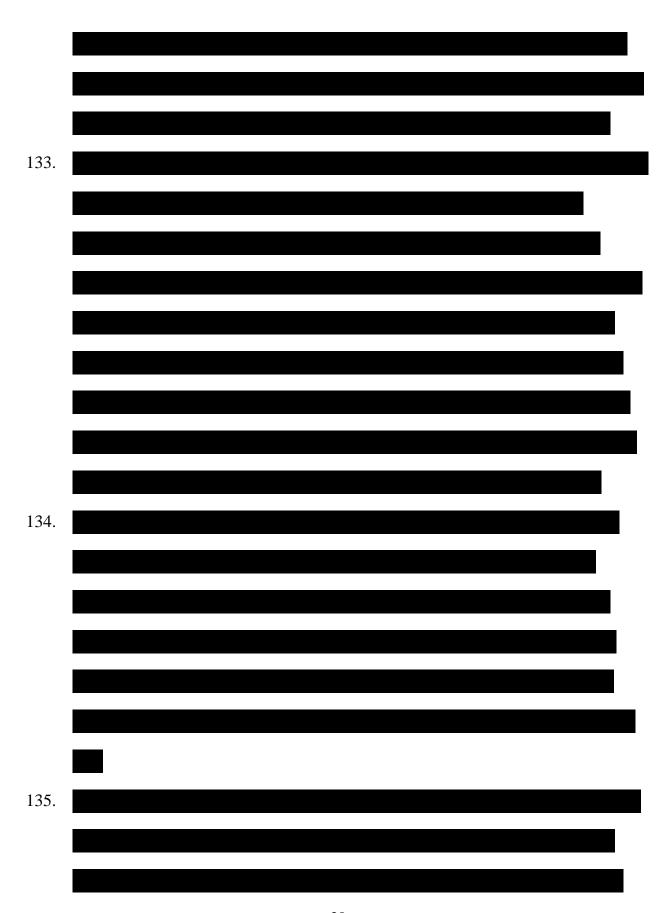


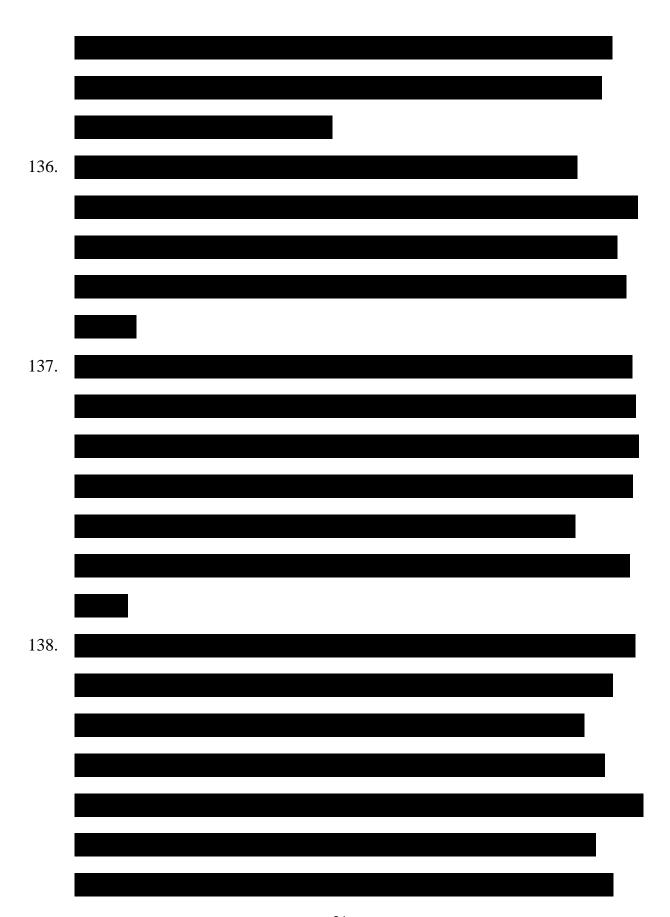


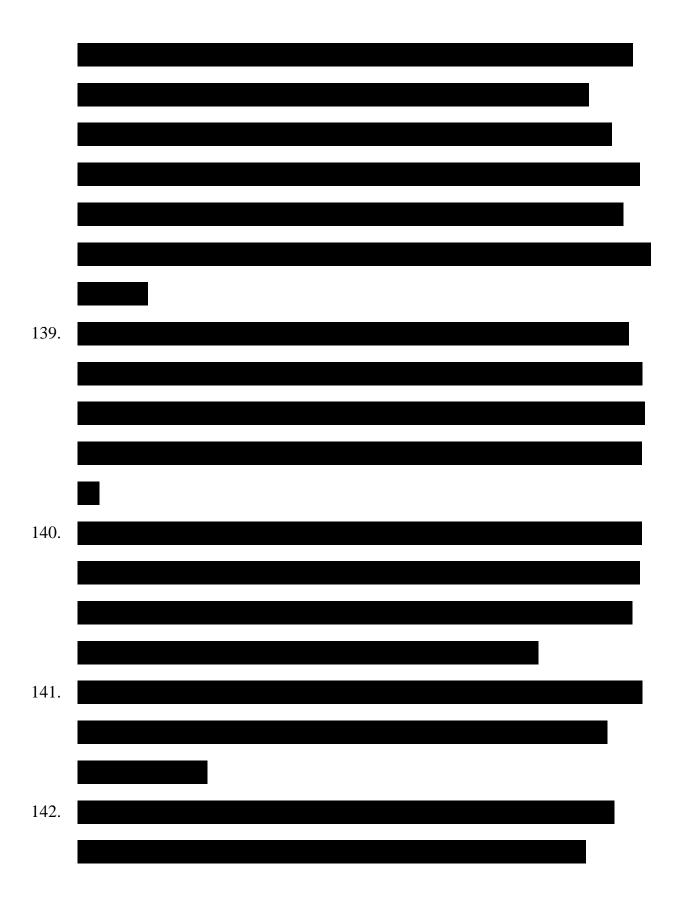
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123.	H. Aaryana Leigh Malcolm, Register No. 09352-085 I have reviewed and am familiar with the medical records of inmate Aaryana Leigh Malcolm, Register No. 09352-085, attached hereto as Exhibit 8 (January 1, 2020, through December 10, 2020).
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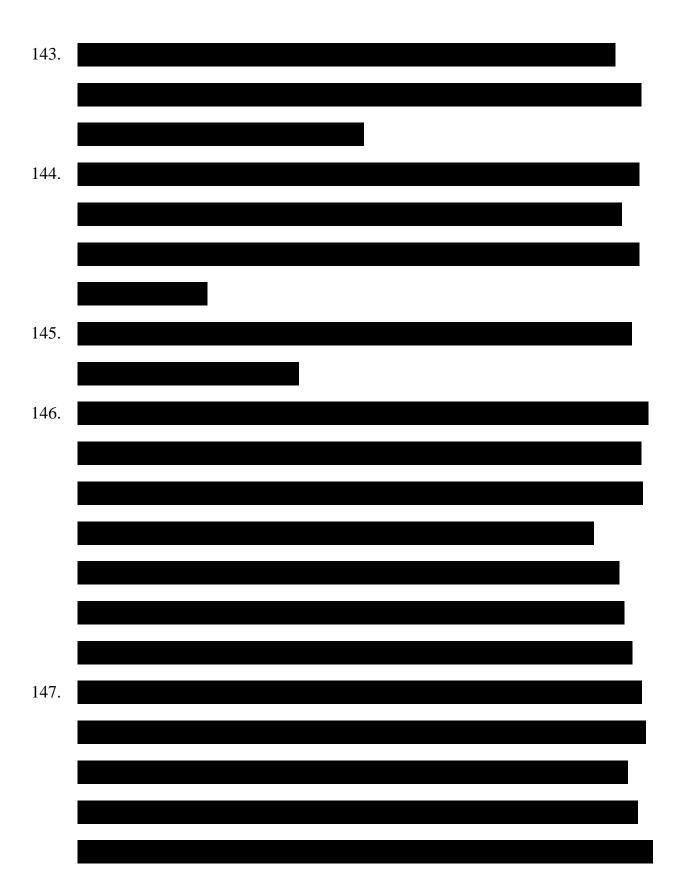


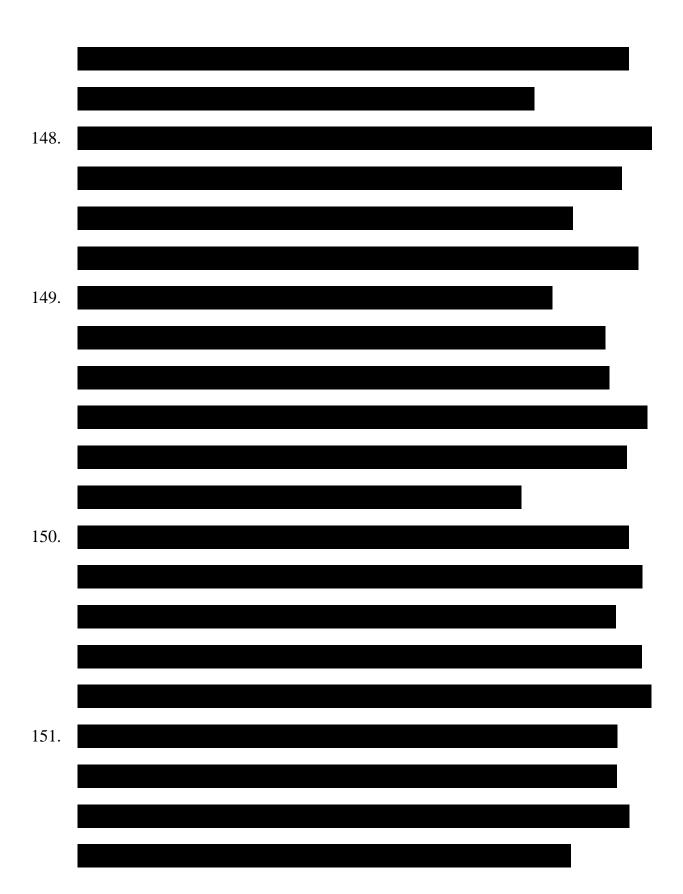


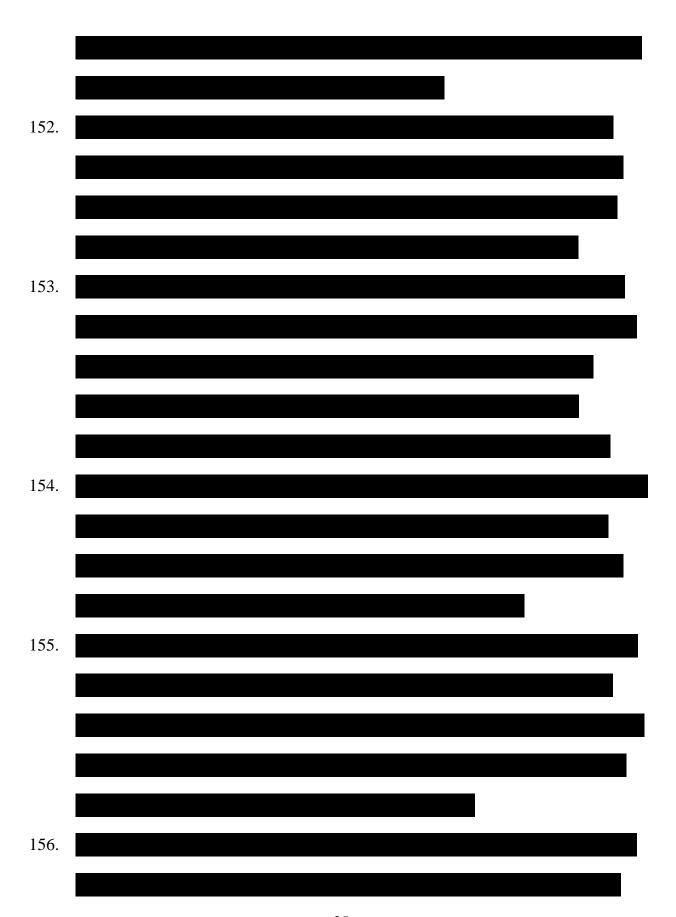


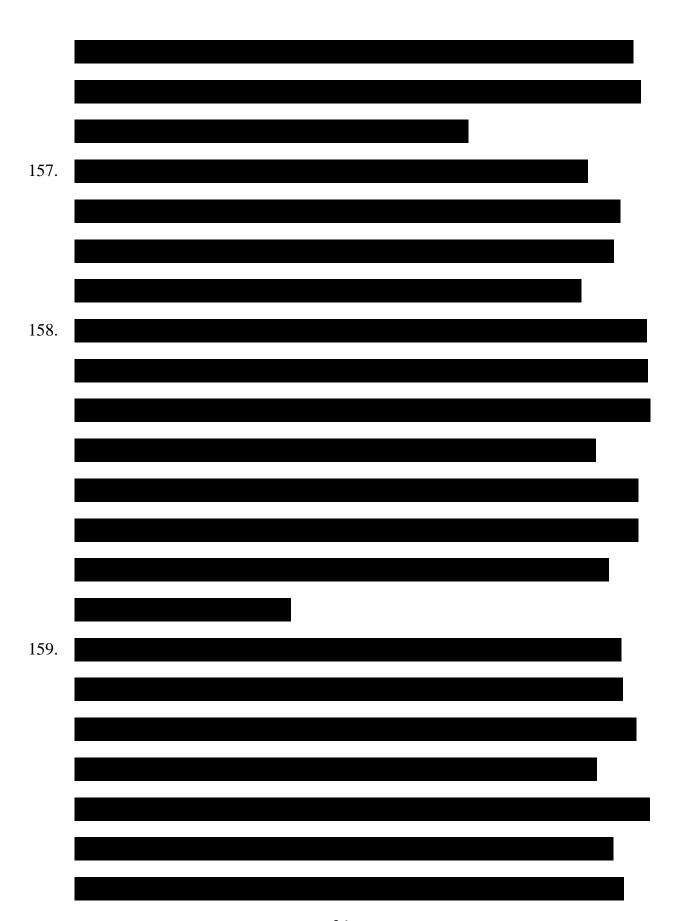


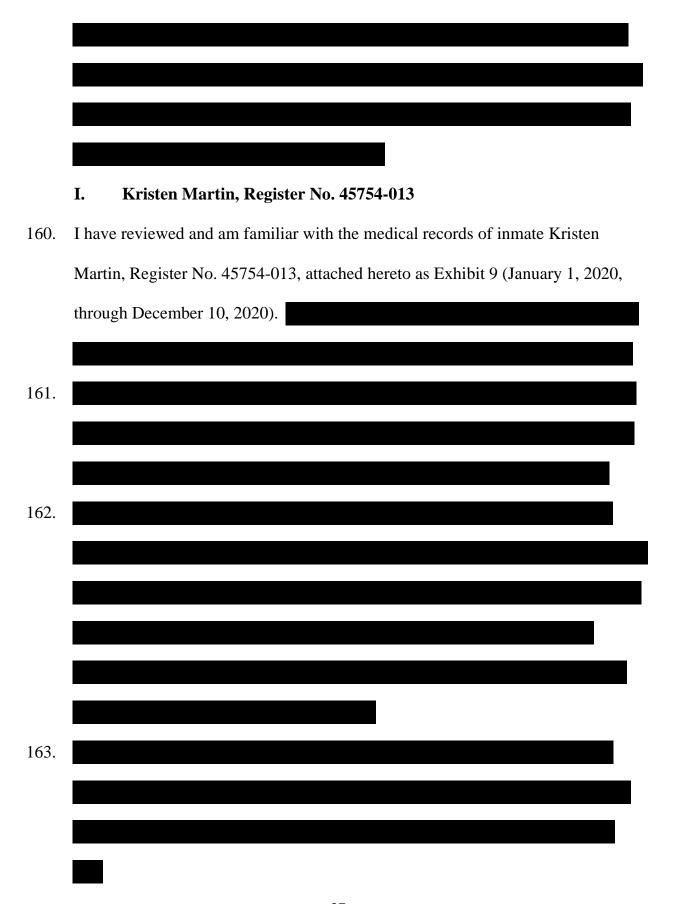




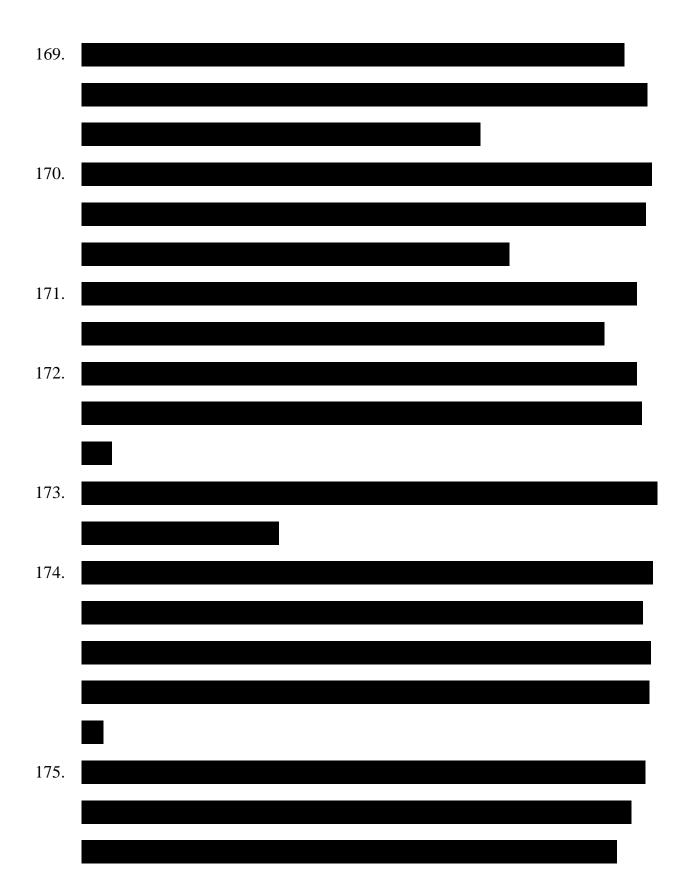


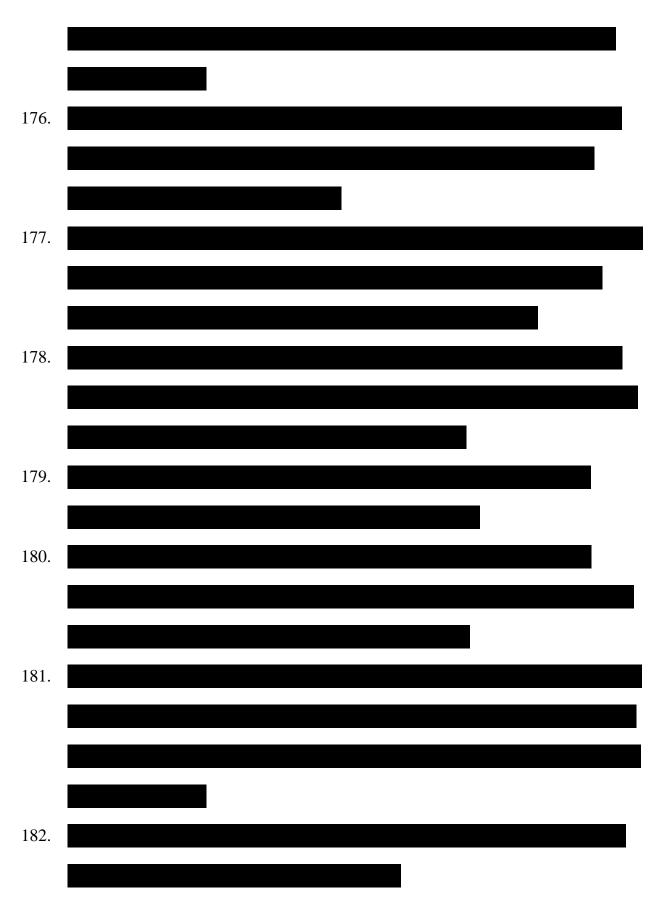


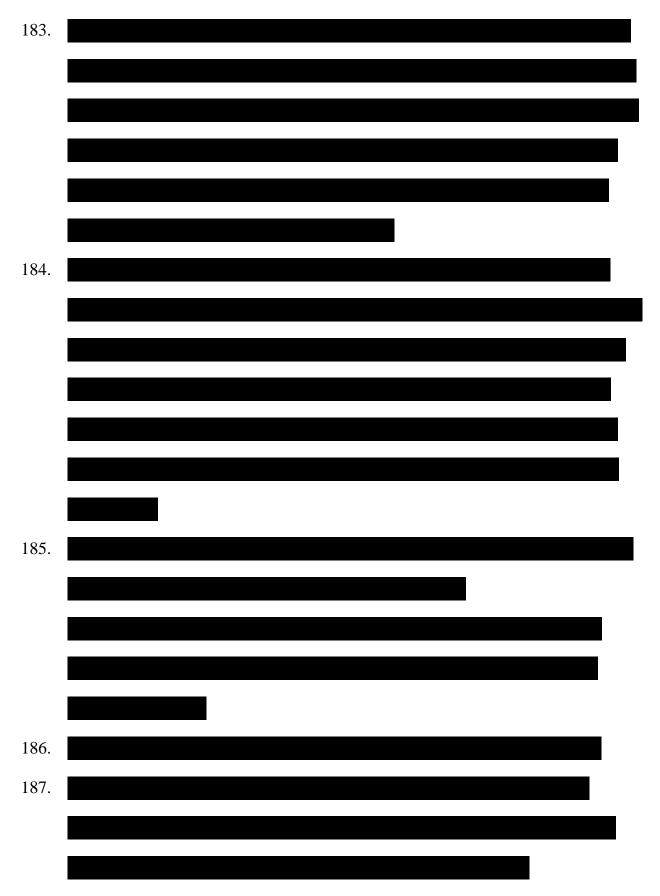


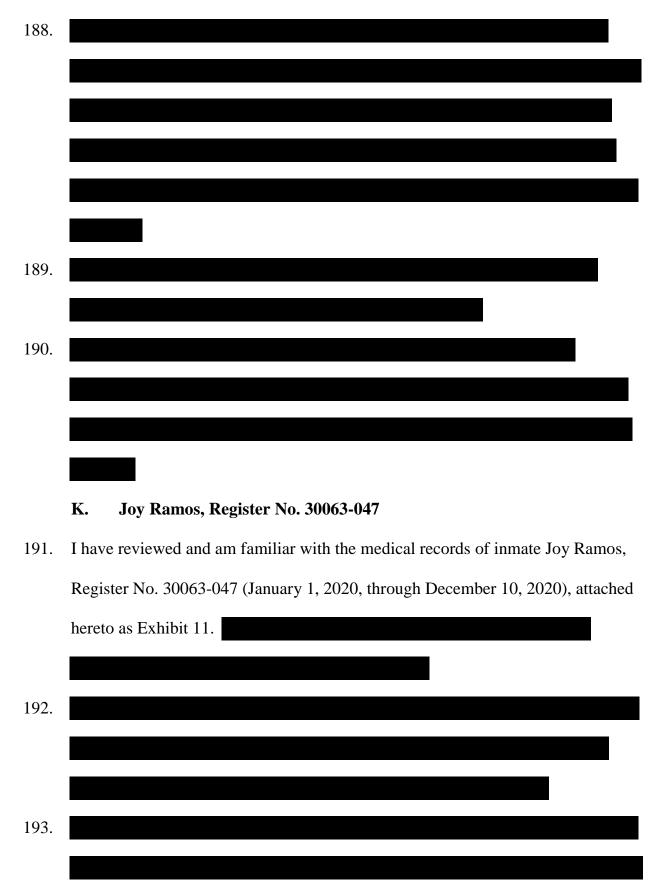


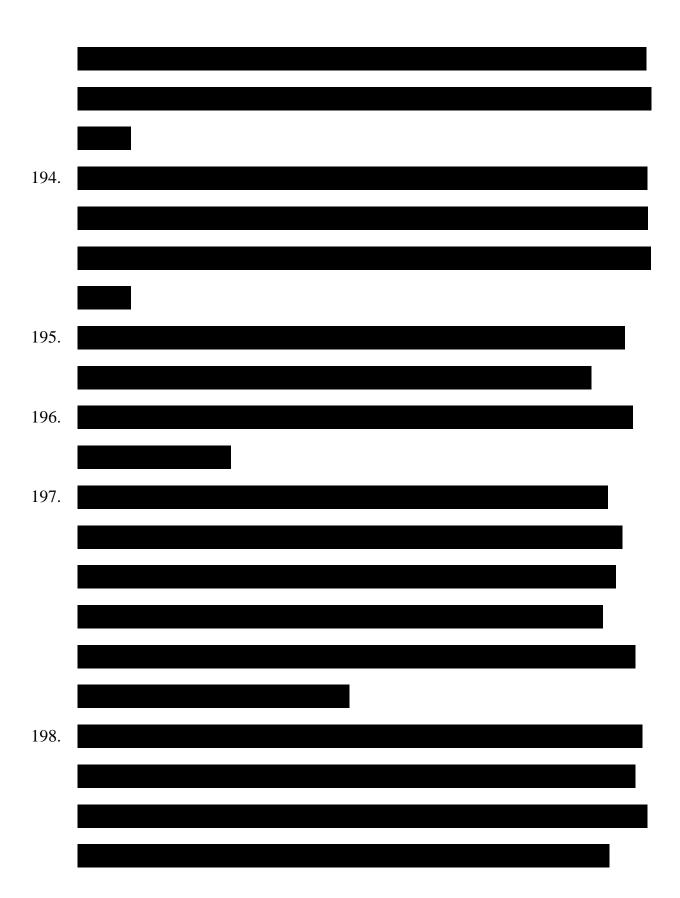
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	J. Kelly Sorenson Rafai, Register No. 21638-041
167.	I have reviewed and am familiar with the medical records of inmate Kelly
	Sorenson Rafai, Register No. 21638-041 (January 1, 2020, through December 10,
	2020), attached hereto as Exhibit 10.
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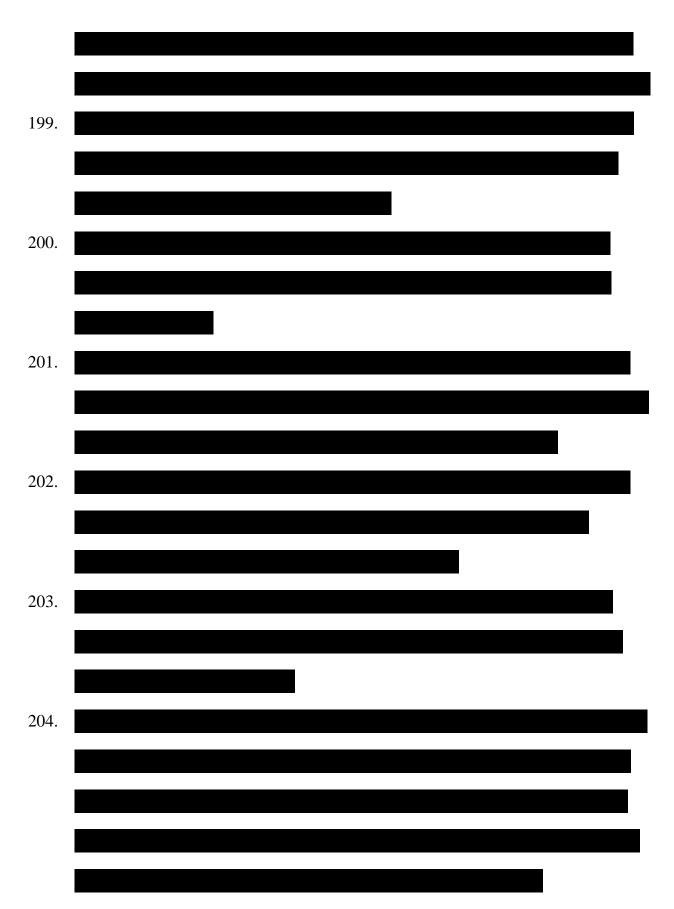


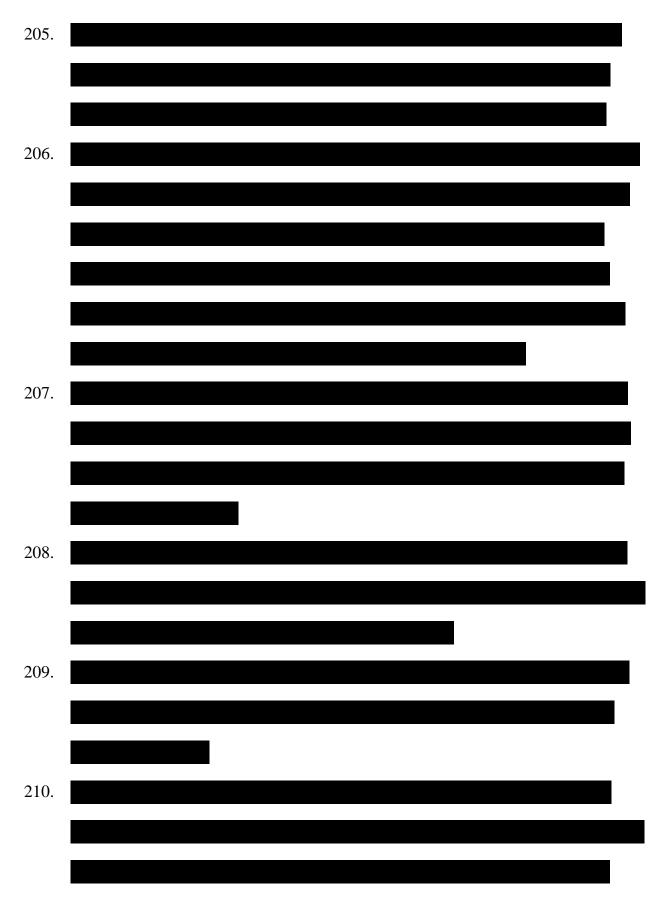


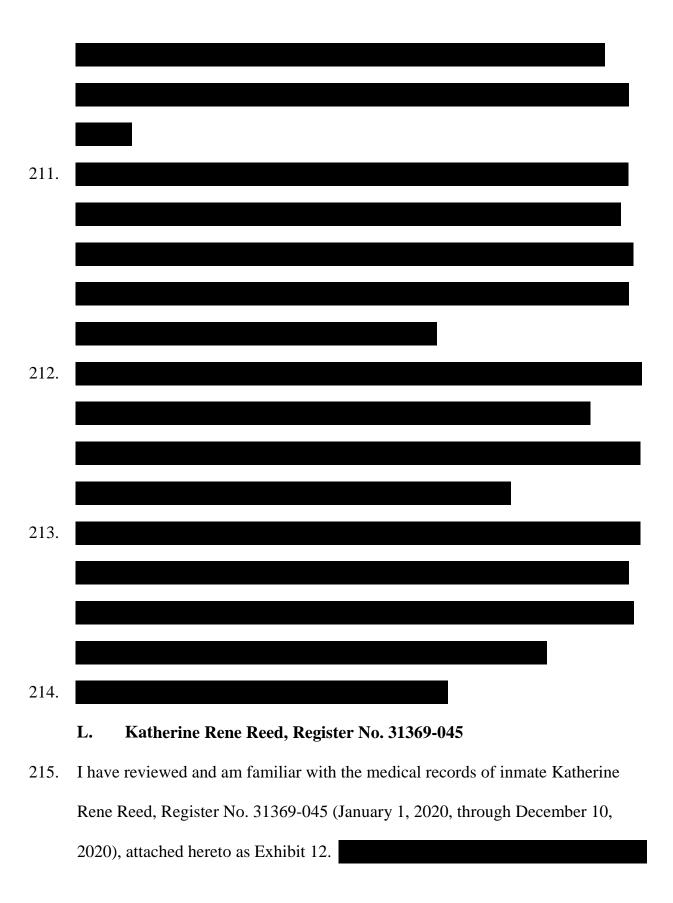




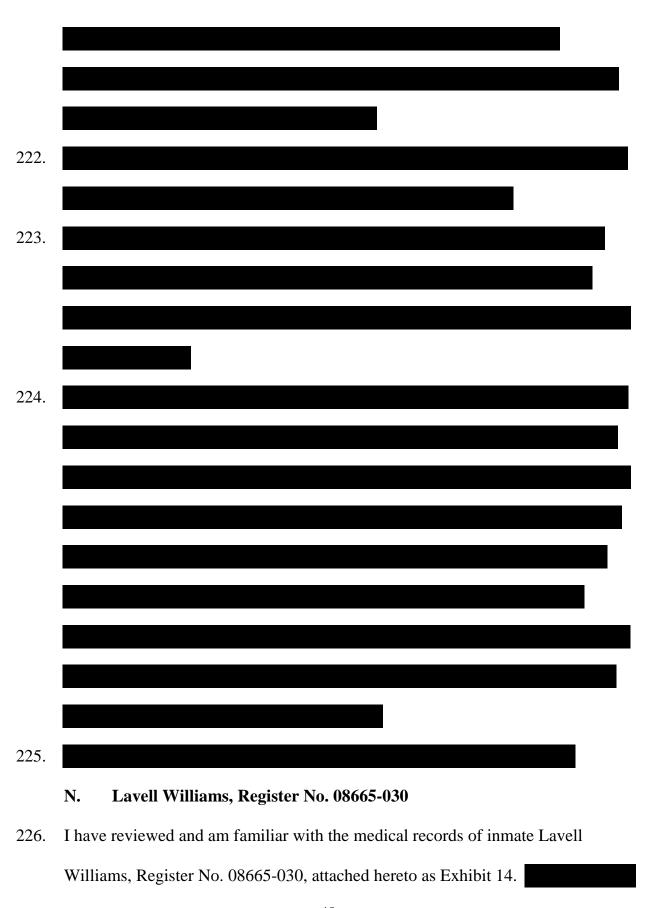


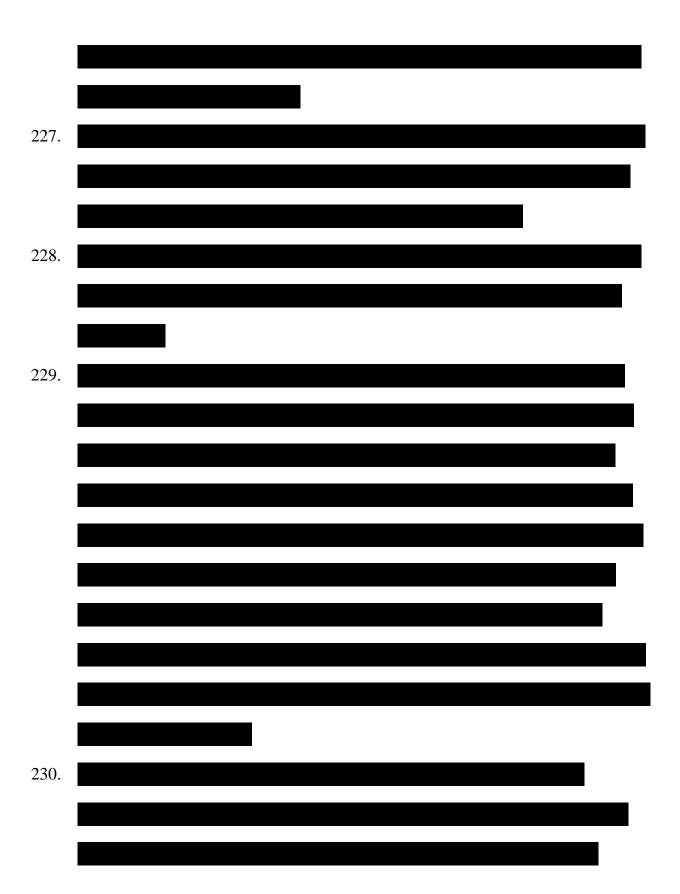


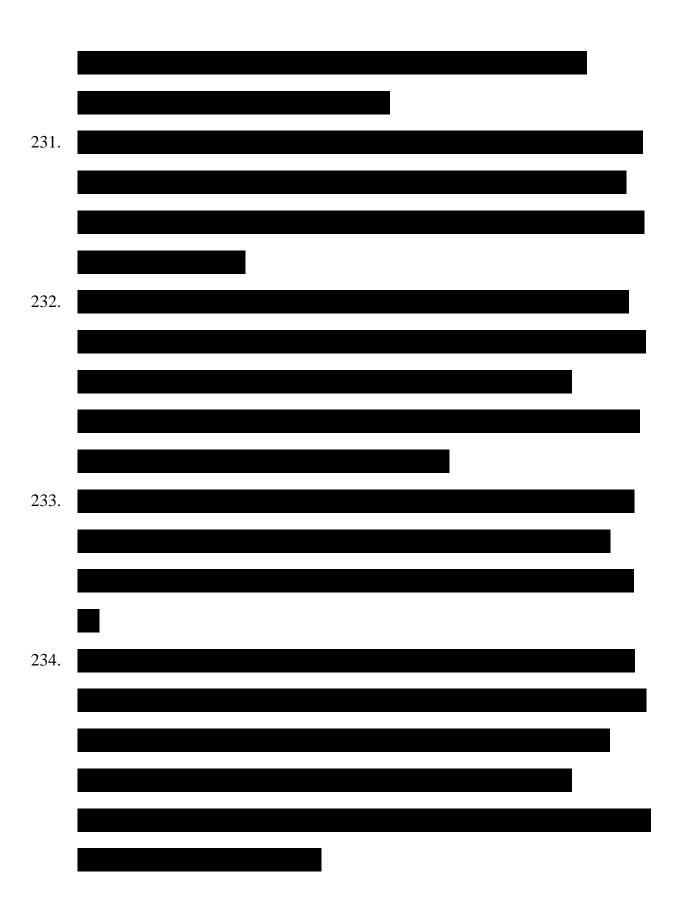


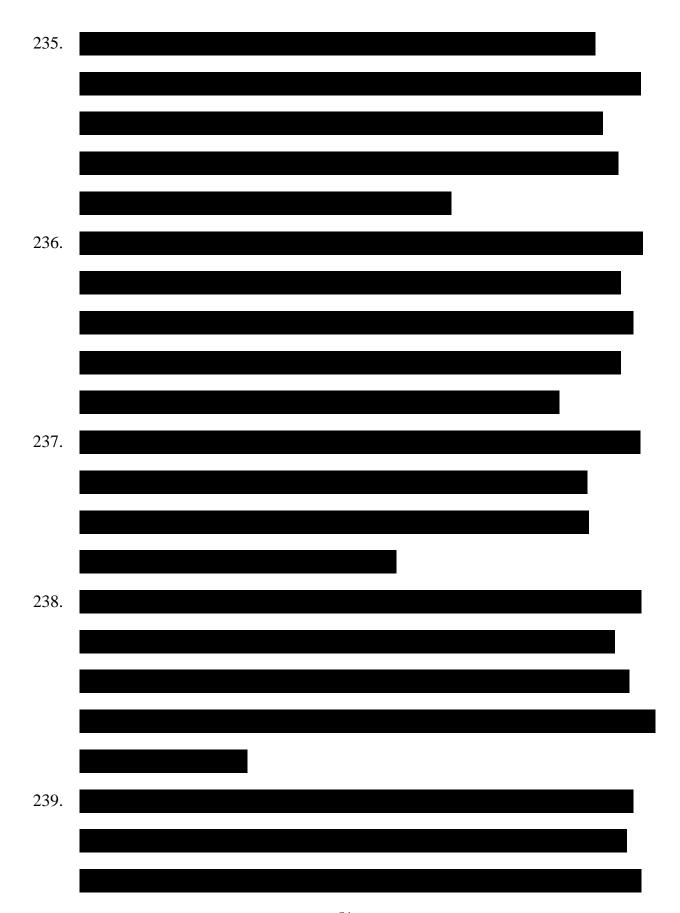


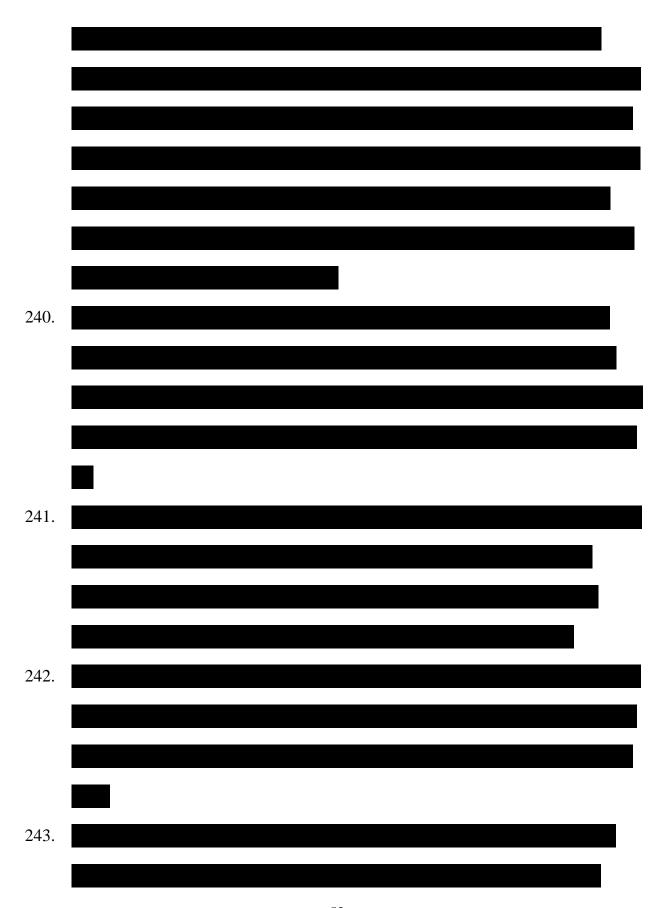
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	M. Chasstady Rose Walker, Register No. 30733-047
220.	I have reviewed and am familiar with the medical records of inmate Chasstady
	Rose Walker, Register No. 30733-047 (January 1, 2020, through December 10,
	2020), attached hereto as Exhibit 13.
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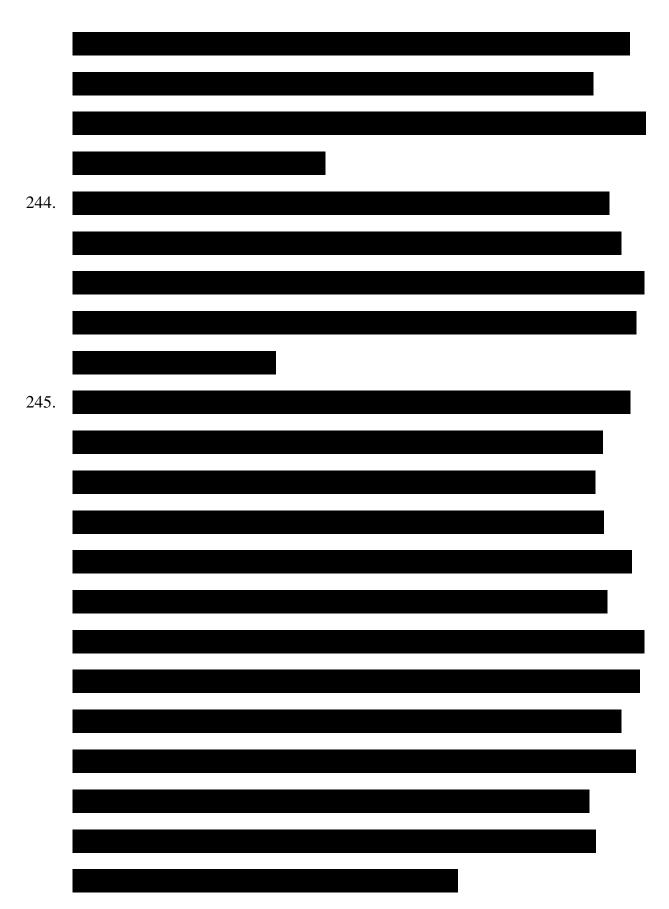


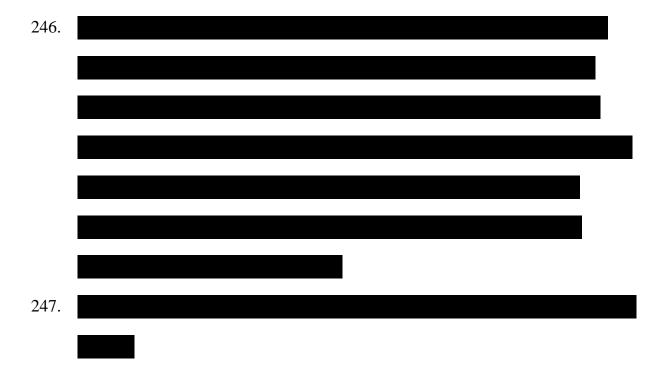












I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed this 47 day of December, 2020.

Linda J. Lindner, M.D.

Federal Correctional Institution

Waseca, Minnesota